



**STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF MANAGEMENT AND BUDGET**

MEMORANDUM

TO: Cabinet Members
Agencies Heads
School Districts
Charter Schools
Delaware Technical and Community College

FROM: Ann S. Visalli *ASV*
Director, Office of Management and Budget

DATE: August 6, 2009

SUBJECT: ARRA Section 1512 Reporting Requirements for Prime Recipients and Approved Sub Recipients

In an effort to ensure transparency, the federal government has placed extensive reporting requirements tied to the acceptance and usage of Federal Stimulus (ARRA) funds. The purpose of this memorandum is to provide guidance for state agencies, school districts and Delaware Technical and Community College to comply with the quarterly reporting requirements contained within Section 1512 of ARRA.

These requirements are delineated within the federal Office of Management and Budget's (OMB) Implementing Guidance for the Reports on Use of Funds Pursuant to the American Recovery and Reinvestment Act of 2009 (June 22, 2009) and its attached supplements (the "Office of Management and Budget's June 22, 2009 Guidance") found at <http://www.recovery.gov/?q=node/579>, as well as information presented in a series of federal OMB webinars found at <http://www.whitehouse.gov/recovery/webinartrainingmaterials/>.

The federal guidance accomplishes the following:

- Designates what programs must report under Section 1512.
- Provides a structure for recipients of ARRA funds to report.
- Provides a listing of data elements that are required to be collected and reported.



- Establishes a timeline and deadlines for state reporting.
- Details a new information system, into which prime recipients and sub-recipients are to report the required data. This system will be available for registration by August 17, 2009 at the following website: www.FederalReporting.gov.

Who is required to comply with this guidance?

- The June 22 guidance designates those programs that are subject to Section 1512 reporting requirements.
- The June 22 guidance further assigns responsibilities to prime recipients, sub recipients and vendors.
- **For purposes of Delaware's implementation of 1512 reporting, and unless approved or designated otherwise, prime recipients will be designated as the sole reporters of data in the federal reporting system. Delaware state agencies are designated prime recipients and shall assume primary responsibility for entering 1512 data into the federal reporting system.** State agencies that feel this designation creates an undue burden may request an exception from the Office of the Lt. Governor. Prime recipients should immediately begin to coordinate the collection of information with any sub-recipients and vendors to ensure thoroughness and accuracy of data collection.

The above direction is not applicable to school districts and charter schools. School districts and charter schools are designated sub-recipients for purposes of ARRA reporting and shall directly report to the federal reporting system all Federal Funding Accountability and Transparency Act data elements required under 1512 (c)(4) for all ARRA funds sub awarded to them by the State of Delaware, in a manner that complies with the OMB June 22 guidance. Each school district and charter school is also required to directly report vendor information as described in the OMB June 22, guidance. Each school district and charter school shall register with www.FederalReporting.gov in order to make timely reports possible.

Prime Recipients

- Prime recipients should immediately:
 - Review the June 22 guidance from federal OMB found at <http://www.recovery.gov/?q=node/579>.
 - Listen to the archived overview webinar on 1512 reporting for prime recipients found at <http://www.whitehouse.gov/recovery/webinartrainingmaterials/>.
 - Obtain a Dun and Bradstreet (DUNS) number for your state agency (if one does not exist already), as well as report the DUNS number for any sub-recipient or vendor who was awarded \$25,000 or greater of ARRA funds. (Note: if a vendor does not have a DUNS number, the name and zip code of the primary office address will be accepted.) OMB strongly encourages you to obtain the DUNS number now, if one

does not already exist, and begin documentation of any sub-recipients and vendors DUNS numbers. Further details are available at <http://fedgov.dnb.com/webform>.

- Prime recipients are also required to obtain and report a Central Contractor Registration (CCR) number, if one does not exist already. Information about obtaining a CCR number can be found at www.ccr.gov.
- Prime recipients will be required to register as an authorized user of the www.FederalReporting.gov website to enter the required data into the system. It is expected this website will be available for user registration on August 17, 2009. Prime recipients are strongly encouraged to register on or about that date. Users will be asked for a User ID, password, email address, phone number and DUNS number.

Sub-Recipients

- Those entities that have been designated sub-recipients for purposes of ARRA funds should immediately:
 - Review the June 22 guidance from federal OMB found at <http://www.recovery.gov/?q=node/579>.
 - Listen to the archived overview webinar on 1512 reporting for sub-recipients found at <http://www.whitehouse.gov/recovery/webinartrainingmaterials/>.
 - Obtain a Dun and Bradstreet (DUNS) number (if one does not exist already), as well as report the DUNS number for any vendor who was awarded \$25,000 or greater of ARRA funds. (Note: if a vendor does not have a DUNS number, the name and zip code of the primary office address will be accepted.) OMB strongly encourages you to obtain the DUNS number now, if one does not already exist, and begin documentation of any vendor DUNS numbers. Further detailed information is available at <http://fedgov.dnb.com/webform>.
- Sub-recipients are not required to obtain and report a Central Contractor Registration (CCR) number.
- Sub-recipients that have been approved to report through the federal reporting system will be required to register as an authorized user of the www.FederalReporting.gov solution website. It is expected this website will be available for registration on August 17, 2009. Sub-recipients that have been designated to report by prime recipients are strongly encouraged to register on or about that date. Users will be asked for a User ID, password, email address, phone number and DUNS number.
- Sub-recipients must provide the same level of detail whether they have been approved to enter data directly into the federal reporting system or give data to the prime to report.
- Sub-recipients should immediately coordinate the collection of information with vendors.

Data Requirements

- A prime recipient that has formally received an ARRA award approval by September 30, 2009 must report on that award by October 10, 2009, regardless of the implementation status of that award and whether any funds have actually been obligated or expended.
- The data that is required to be reported by October 10, 2009 is cumulative for the period of the grant award. Therefore, for the October 10, 2009 submission prime recipients will be reporting on data for the period February 17, 2009 – September 30, 2009.
- Required data elements for prime recipients, sub-recipients and vendors can be found in the “Recipient Reporting Data Model V2.0.1” this document can be found at <http://www.recovery.gov/sites/default/files/Final+OMB+Templates.pdf>.

Federal Reporting System

The June 22 federal guidance allows for three types of data entry to report 1512 reporting data into the federal reporting system. These are as follows:

1. *Online data entry through a web browser.* In this option, prime recipients and approved sub-recipients enter 1512 data through a web based form. This form contains all of the data elements required to be reported in the June 22 guidance.
2. *Upload of a preformatted Excel spreadsheet.* This spreadsheet will be released by federal OMB within the next few weeks and will be available for prime recipients and approved sub-recipients to begin the process of data collection and entering. Excel 2003 or higher is required to use this option.
3. *Direct XML central file upload to the federal reporting system.*

Delaware prime recipients and approved designated sub-recipients are required to use method #2, the Excel spreadsheet upload to accomplish the required data reporting under Section 1512. The Excel spreadsheet is expected to be released by the federal OMB in the near future. In the interim, a draft prototype spreadsheet for your use is available at the ARRA Reporting & Guidance section of the Delaware OMB website at <http://omb.delaware.gov>. The final federal OMB Excel spreadsheet will be posted at this site once released by the federal government.

Prime recipients and approved sub-recipients are required to email a copy of the final Excel spreadsheet uploaded to the federal website by October 10 to OMB_ARRA1512@state.de.us.

Examples

- State Agency A receives an award for \$500,000, expends \$400,000 and sub awards \$100,000 to State Agency B. As of September 30, State Agency B has not expended any of the funds. In this instance, State Agency A would report expenditures of \$400,000 since the sub award to State Agency B does not constitute an expenditure of state funds.
- State Agency A receives an award of \$500,000, expends \$400,000 and sub-awards \$100,000 to State Agency B. State Agency B contracts with Vendor X for the full \$100,000 sub-award. In this instance, and unless otherwise approved, State Agency A will be responsible for reporting the full \$500,000 expenditure as part of their 1512 report for that award, but State Agency B will have to provide State Agency A with all required vendor information for Vendor X.
- State Agency A receives an award for \$500,000 and sub-awards \$250,000 to Municipality A and \$250,000 to Municipality B. State Agency A will be responsible for reporting the full \$500,000 awards. Municipality A and Municipality B will have to provide State Agency A with required sub-recipient data elements for use in compiling State Agency A's 1512 report for that award.

Next Steps

Questions on 1512 reporting can be sent to OMB_ARRA1512@state.de.us. Previous ARRA guidance can be found on the ARRA Reporting & Guidance section of the OMB website at <http://omb.delaware.gov/>.